

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
v.)	Civil Case No. 20-cv-00874-RK
)	
JAMES B. NUTTER & COMPANY,)	
)	
Defendant.)	

THE UNITED STATES' MOTION TO ENTER STIPULATED PROTECTIVE ORDER
(incorporating suggestions in support)

Plaintiff United States of America moves the Court to enter a Stipulated Protective Order, attached hereto as Exhibit 1.

1. The United States and Defendant James B. Nutter Company ("Nutter") (collectively, the "Parties") negotiated and agreed to substantially all provisions of the Stipulated Protective Order, with the exception of paragraphs 36 and 37, which govern the intragovernmental sharing of information obtained by the United States in Discovery (the "Intragovernmental Sharing Provisions"). The United States proffered, and Nutter opposed, the Intragovernmental Sharing Provisions.

2. On September 14, 2021, the Court conducted a telephonic hearing to address the dispute between the Parties concerning the Intragovernmental Sharing Provisions.

3. In an Order dated September 16, 2021 (Dkt. No. 75, at 3-4), the Court found that the "language proffered by the Government allowing for intragovernmental sharing of information is warranted" and ruled that it "may be included in the otherwise agreed-to protective order."

4. In light of the Court's Order, Nutter does not object to the entry of the attached Stipulated Protective Order, which includes the Parties' agreed-to language and the Intragovernmental Sharing Provisions proffered by the United States.

WHEREFORE, for the reasons set forth above, and based on the agreement of the United States and Nutter and the Court's September 16, 2021 Order, the United States respectfully requests that the Court approve and enter the Stipulated Protective Order.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of October, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to all counsel of record.

/s/ Kelly E. Phipps
Trial Attorney, U.S. Department of Justice